

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB MDL No. 2323
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i> Plaintiffs, v. National Football League and NFL Properties, LLC, <i>successor-in-interest to NFL Properties, Inc.,</i> Defendants.	No. 14-cv-00029-AB
THIS DOCUMENT RELATES TO: <i>Martin v. Kansas City Chiefs Football Club, LLC</i> <i>Lewis v. Kansas City Chiefs Football Club, LLC</i>	No. 14-cv-3381 No. 14-cv-1995

**MOTION TO DISMISS THE COMPLAINT FILED BY SETTLEMENT
CLASS MEMBER ANITA MARTIN**

Defendant the Kansas City Chiefs Football Club, LLC ("Chiefs") move to dismiss, with prejudice, the Complaint filed by Settlement Class Member Anita Martin. In support of this motion, the Chiefs rely on the points and authorities in the accompanying memorandum of law, which the Chiefs submit herewith and incorporate herein in its entirety.

The Chiefs respectfully request oral argument on this motion.

Dated: September 27, 2018

Respectfully submitted,

/s/ Brad S. Karp

Brad S. Karp

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CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing document, and accompanying memorandum of law, was served electronically via the Court's electronic filing system on the 27 day of September, 2018, upon all counsel of record.

Dated: September 27, 2018

/s/ Brad S. Karp
Brad S. Karp